

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ SECURITIES  
LITIGATION

Case No. 1:19-cv-01339

The Honorable Robert M. Dow, Jr.

Magistrate Judge Maria Valdez

**LEAD PLAINTIFF UNION’S UNOPPOSED MOTION TO FILE UNDER SEAL**

Lead Plaintiff Union Asset Management Holding AG (“Union”) respectfully moves, pursuant to Local Rules 5.8 and 26.2, for an Order granting Union leave to file under seal Exhibits 1 and 2 (the “Confidential Exhibits”) to the Declaration of Katherine M. Sinderson in Support of Lead Plaintiff Union’s Opposition to the Kraft Heinz Defendants’ Motion to Compel Discovery from Union Asset Management Holding AG (the “Sinderson Declaration”). Union has also applied limited redactions to the publicly filed Opposition to the Kraft Heinz Defendants’ Motion to Compel Discovery from Union Asset Management Holding AG (the “Opposition”) in order to exclude the deposition testimony designated as “Confidential” by Union discussed therein, and accordingly requests leave to file under seal an unredacted version of said Opposition as well.

Exhibits 1 and 2 contain excerpts of the May 4, 2022 deposition transcripts of Union’s 30(b)(6) corporate representatives Dr. Carsten Fischer and Mr. Jochen Riechwald, respectively, which Union designated as “Confidential” under the Confidentiality Order entered by this Court on December 3, 2021. *See* ECF No. 333.

The requested relief is narrowly tailored to protect the deposition testimony designated as “Confidential” by Union described herein. Defendants have consented to this motion. Pursuant to Local Rule 26.2(c), Union intends to file the Confidential Exhibits and a redacted version of the Opposition under seal simultaneously with this motion. Union will at that same time provide

unredacted versions of the sealed documents to Defendants and the Court.

For the foregoing reasons, Union respectfully requests that the Court enter an order granting it leave to file under seal Exhibits 1 and 2 to the Sinderson Declaration and an unredacted version of the Opposition.

Dated: August 24, 2022

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

/s/ Katherine M. Sinderson

Katherine M. Sinderson (*pro hac vice*)

Salvatore J. Graziano (*pro hac vice*)

Abe Alexander (*pro hac vice*)

Jesse L. Jensen (*pro hac vice*)

Benjamin W. Horowitz (*pro hac vice*)

Nicole Santoro (*pro hac vice*)

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

katiem@blbglaw.com

salvatore@blbglaw.com

abe.alexander@blbglaw.com

jesse.jensen@blbglaw.com

will.horowitz@blbglaw.com

nicole.santoro@blbglaw.com

-and-

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

Avi Josefson (#6272453)

875 North Michigan Avenue, Suite 3100

Chicago, Illinois 60611

Telephone: (312) 373-3880

Facsimile: (312) 794-7801

avi@blbglaw.com

*Counsel for Co-Lead Plaintiff Union Asset  
Management Holding AG and Co-Lead  
Counsel for the Class*